## Case 1:19-cr-00523-NRB Document 47 Filed 11/18/20 Page 1 of 1



## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

November 18, 2020

## **VIA ECF**

The Honorable Naomi Reice Buchwald United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Elvis Bisono et al., 19 Cr. 523 (NRB)

Dear Judge Buchwald,

The Government writes to respectfully request that the Court reschedule the upcoming status conference in the above-captioned matter, currently scheduled for Thursday, November 19, 2020 at 2:00 p.m. As the Court is aware, two of the three defendants in this matter have pleaded guilty pursuant to plea agreements and are scheduled to be sentenced. (*See* October 13, 2020 Minute Entry; November 17, 2020 Minute Entry). The Government and defense counsel for Reynor D. Hungria Brito have discussed, and continue to discuss, a potential pre-trial disposition in this case, and anticipate that those discussions will conclude in the coming weeks. Accordingly, the parties have no updates or applications to bring to the Court's attention.

In light of the foregoing, the Government respectfully requests a three-week adjournment of the upcoming status conference for the purpose of facilitating discussions regarding a pre-trial resolution for Brito. The Government has conferred with defense counsel, who consents to the request for an adjournment. The Government further requests that time be excluded under the Speedy Trial Act through the date of the next conference for the same purpose. *See* 18 U.S.C. § 3161(7)(A) (time under the Speedy Trial Act is properly excluded where the "ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial").

Application granted. The status conference is adjourned until December 10, 2020 at 11:00 a.m. Speedy trial time is excluded through that date. 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED.

Cc: All counsel (via ECF)

Very truly yours,

**AUDREY STRAUSS** 

Acting United States Attorney

by: \_\_/s\_\_\_

Sarah Mortazavi

Assistant United States Attorney

(212) 637-2520

NAOMI REICE BUCHWALD UNITED STATES DISTRICT JUDGE

Dated: New York, New York
November 18, 2020